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Attorneys for ASPLUNDH CONSTRUCTION, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF GEOFFREY A.
HEATON IN SUPPORT OF
ASPLUNDH CONSTRUCTION, LLC'S
RESPONSE TO REORGANIZED
DEBTORS' TWENTY-FIRST
OMNIBUS OBJECTION TO CLAIMS
(BOOKS AND RECORDS CLAIMS)**

Date: January 27, 2021

Time: 10:00 a.m.

Place: (Telephonic Appearance Only)

450 Golden Gate Avenue

Courtroom 17, 16th Floor

San Francisco, CA 94102

Related Docket No. 9272

I, Geoffrey A. Heaton, declare:

1. I am an attorney at law duly licensed to practice before this Court, and am special counsel in the law firm of Duane Morris LLP, counsel to creditor Asplundh Construction, LLC ("Asplundh"). The matters stated below are made and based upon my personal knowledge, except

1 for those matters stated upon information and belief, and as to those matters I believe them to be true.

2 If called as a witness, I could and would competently testify to the matters set forth below.

3 2. I submit this declaration in support of Asplundh's Response to Reorganized Debtors'
4 Twenty-First Omnibus Objection to Claims (Books and Records Claims) ("Response"), filed
5 herewith.

6 3. On behalf of Asplundh, I have repeatedly attempted to obtain information from the
7 Debtors concerning the grounds for the Debtors' "rejection" of the invoices pertaining to the Disputed
8 Claim Amount, as that term is defined in the Response, and otherwise obtain feedback from the
9 Debtors in an effort to resolve the Objection.

10 4. At this writing, I have not obtained a substantive response from the Debtors.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct. Executed on December 15, 2020, at San Francisco, California.

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14 /s/ Geoffrey A. Heaton (206990)
15 GEOFFREY A. HEATON
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